

Denise Carlon, ESQUIRE
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Attorneys for M&T Bank

IN THE MATTER OF:

Dane Richards Sr.

DEBTOR.

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 18-11152 CMG

LIMITED OBJECTION TO
MOTION TO SELL

The undersigned, Denise Carlon, Esquire For KML Law Group, P.C., attorney for Secured Creditor **M&T Bank**, the holder of a Mortgage on the debtors' premises at **11 Eton Place Eatontown, NJ 07724** hereby objects to the Order Approving Sale for the following reasons:

1. The proposed order provides that the sale shall be free and clear of all liens, including this lien, with liens attaching to proceeds of the sale.
2. The proposed order does not indicate how much will be paid to Secured Creditor. Any payoff of the Secured Creditor's claim must be calculated according to New Jersey state law. See 11 U.S.C 1325(a)(5)(B)(I)(aa).

In the event the Order is amended, this objection will be withdrawn.

/s/ Denise Carlon, Esquire

Denise Carlon, ESQUIRE
Attorney for M&T Bank

Dated: February 15, 2018